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May 8, 2014

**via ELECTRONIC FILING**

Magistrate Judge A. Kathleen Tomlinson  
United States District Court Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, N.Y. 11722

Re: Thomas M. Moroughan v. County of Suffolk, et al.  
12-CV-0512 (JFB)(AKT)

Dear Judge Tomlinson:

I represent the individually named Defendant Officer Anthony DiLeonardo in the above-referenced action and I am writing this letter to inform the Court that I oppose Defendant Hunter's request for a five and one-half (5 ½) month extension of the discovery deadline.

Counsel has represented Defendant Hunter since the beginning of December of last year. Although I understand the issues with which counsel was presented, as set forth in his application to Your Honor, I cannot consent to such a lengthy request.

When Mr. Schroeder asked for my consent, he did not indicate the length of time he would be requesting; I too am at fault for not requesting this information from him. However, in his email request for my consent, he stated that he would be out of the country from May 12 to May 22, 2014 and therefore he would be away during the discovery deadline; indicating only that he would not be able to conduct the deposition of Plaintiff and Plaintiff's girlfriend before the end of discovery.

My consent to Mr. Schroeder was limited to his request, to extend the discovery deadline until he returned from his travels outside of the country so that he could conduct the deposition of Plaintiff and his girlfriend.

My client has not been indemnified by the County and he has been vilified in the press due to the press gaining access to Nassau County's IAU report which was attached as an exhibit

to Plaintiff's papers even though such report was the subject of a confidentiality order. Finally and significantly, there has been more than ample time given by this Court to conduct the discovery in this matter, which has cost my client and continues to cost him significant personal and financial hardships.

Thus, I cannot consent to the extension of the discovery deadline for such a significant period of time and only gave my consent for the limited purpose of allowing Mr. Schroeder to return from his travels so that he could then conduct the deposition of Plaintiff and Plaintiff's girlfriend.

Respectfully Submitted,

/s/ Amy Marion  
Amy Marion

cc: All counsel of record via ECF